

August 19, 2011

Ex Parte Notice

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing a Unified Intercarrier Compensation Regime, CC Docket 01-92

Dear Ms. Dortch:

On August 17, 2011, Michael Romano, Senior Vice President of Policy at the National Telecommunications Cooperative Association (NTCA), had a telephone conversation with Zac Katz, chief counsel and senior legal advisor to Chairman Julius Genachowski, and Sharon Gillette, of the FCC's Wireline Competition Bureau, to discuss the Universal Service Fund (USF) and the intercarrier compensation (ICC) reform plan (RLEC Plan) submitted by NTCA and other national, regional, and state associations in April 2011 (*see*, Comments of NECA, *et al.*, filed April 18, 2011)), and modified subsequently by a broader industry "Consensus Framework" filed at the Commission last month (*see*, *Ex Parte* filing of USTelecom, et al., filed July, 29, 2011)).

Mr. Romano explained that any material changes to the RLEC Plan, as modified by the Consensus Framework, or any attempts to blend or otherwise import elements of the separate and distinct "America's Broadband Connectivity" into the RLEC Plan, would disrupt the carefully crafted balance of interests that led to the landmark industry agreement, and likely result in its collapse. Mr. Romano explained that the RLEC Plan, as modified, entertains significant overhaul of current mechanisms while retaining a reasonable opportunity for cost recovery.

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Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. Please do not hesitate to contact me at (703) 351-2035 or jeeidemann@ntca.org if you have any questions or require additional information.

Respectfully submitted,

/s/ Joshua Seidemann Joshua Seidemann

Director of Policy

cc: Zachary Katz Sharon Gillette